

REMARKS

In the Office Action dated March 16, 2004, the Examiner rejected claims 5 and 10 under 35 U.S.C. § 102(e) in view of Guthrie et al. (U.S. Patent No. 6,385,661) and rejected claims 1, 2, 4, 6, 7, 9, and 11-13 under 35 U.S.C. § 103(a) as being unpatentable over Guthrie et al.

By this amendment, Applicants amend claims 1, 2, and 5-7. Based on these amendments and the following remarks, Applicants respectfully traverse the rejection of claims 1, 2, 4-7, and 9-13.

I. Rejections under 35 U.S.C. § 102(e)

The rejection of claims 5 and 10 under 35 U.S.C. § 102(e) is respectfully traversed for the following reasons.

The Examiner asserts that Guthrie et al. teaches receiving at runtime an indication of at least one interface having a plurality of methods and generating at runtime a class that implements the interface by generating code for each of the methods that dispatches an invocation of the method to the invocation handler. See *Office Action, page 3, lines 2-18*.

Applicants disagree with the Examiner's interpretation of Guthrie et al. The reference discloses a system that allows a client system to use proxy objects to facilitate access to a remote system. Although Guthrie et al. dynamically generates proxy objects, they merely model the interface and list of methods included in a subject object. The reference does not teach specifying, by a processing entity at runtime, at least one interface that is not referenced by the processing entity, the interface having a

plurality of methods. Moreover, Guthrie et al. does not disclose generating at runtime a class that implements the at least one interface by generating code for each of the methods that dispatches an invocation of the methods to the invocation handler. In fact, Applicants traverse the Examiner's position that the subject object disclosed by Guthrie et al. is an invocation handler. See *Office Action*, page 3, line 5. Instead, the subject object is an object for which client system 14 requests access, and does not receive a dispatch of a method invocation, as asserted by the Examiner.

Because Guthrie et al. does not support the rejection of claim 5 under 35 U.S.C. § 102(e), Applicants request that the rejection be withdrawn and the claim allowed.

The Examiner rejects claim 10 for the same reasons set forth in connection with claim 1. See *Office Action*, page 3, lines 19-20. As explained, Guthrie et al. does not support the rejection of claim 1. Accordingly, the cited art does not support the rejection of claim 10, and Applicants request that the rejection of this claim under 35 U.S.C. § 102(e) be withdrawn and the claim allowed.

II. Rejections under 35 U.S.C. § 103(a)

The rejection of claims 1, 2, 4, 6, 7, 9, and 11-13 under 35 U.S.C. § 103(a) is respectfully traversed for the following reasons.

In rejecting claim 1, the Examiner asserts that Guthrie et al. teaches generating at runtime a class that implements an interface specified at runtime having a method, creating an instance of the class, receiving by the class instance a request to process

the method of the interface, and dispatching the request to an object to facilitate processing of the method of the interface. See *Office Action*, page 4, ¶ .

Applicants respectfully disagree with the Examiner's interpretation of Guthrie et al. As explained, the reference discloses a system that enables a client system to access a subject object through a dynamically generated proxy object. Although the proxy object may include the interfaces and methods of the subject object (see Guthrie et al., col. 4, lines 63-65), the reference does not teach or suggest specifying, by a processing entity at runtime, an interface that is not referenced by the processing entity, the interface having a method and generating, at runtime, a class that implements the interface. Contrary to the Examiner's assertions, the interfaces in Guthrie et al. are not specified at runtime, but rather happen to be included in the proxy object as a result of its association with the subject object.

Further, even if the interfaces included in the proxy object of Guthrie et al. were "specified at runtime," a position that Applicants traverses, the reference still fails to support the rejection of claim 1. The reference fails to teach or suggest generating at runtime a class that implements the interface specified at runtime, the interface not being referenced by the processing entity that specified the interface.

Accordingly, Guthrie et al. does not support the rejection of claim 1 under 35 U.S.C. 103(a), and Applicants respectfully request that the rejection of this claim be withdrawn and the claim allowed.

Claims 2 and 4 and depend from claim 1. As explained, the cited art does not support the rejection of claim 1. Accordingly, it follows that Guthrie et al. also does not

support the rejection of claims 2 and 4, and Applicants request that the rejection of these claims under 35 U.S.C. § 103(a) be withdrawn and the claims allowed.

The Examiner rejects claims 6, 7, and 9 for the same reasons set forth in connection with claims 1, 2, and 4, respectively. *See Office Action, page 6, lines 4-6.* As explained, Guthrie et al. does not support the rejection of claims 1, 2, and 4. Accordingly, the cited art does not support the rejection of claims 6, 7, and 9, and Applicants request that the rejection of these claims under 35 U.S.C. § 103(a) be withdrawn and the claims allowed.

The Examiner rejects claim 11 for the same reasons set forth in connection with claims 1 and 5. *See Office Action, page 6, lines 7-8.* As explained, Guthrie et al. does not support the rejection of claims 1 and 5. Accordingly, the cited art does not support the rejection of claim 11, and Applicants request that the rejection of this claim under 35 U.S.C. § 103(a) be withdrawn and the claim allowed.

The Examiner rejects claims 12 and 13 for the same reasons set forth in connection with claim 1. *See Office Action, page 6, lines 9-10.* As explained, Guthrie et al. does not support the rejection of claim 1. Accordingly, the cited art does not support the rejection of claims 12 and 13 and Applicants request that the rejection of these claims under 35 U.S.C. § 103(a) be withdrawn and the claims allowed.

III. Conclusion

In view of the foregoing remarks, Applicants submit that this claimed invention, is neither anticipated nor rendered obvious in view of the art cited by the Examiner. Applicants therefore request the Examiner's reconsideration and reexamination of the application and the timely allowance of the pending claims.


Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.

Dated: June 15, 2004

By: _____


Joseph E. Palys
Reg. No. 46,508